

1 JAMES T. HANNINK (131747)  
jhannink@sdlaw.com  
2 ZACH P. DOSTART (255071)  
zdostart@sdlaw.com  
3 DOSTART HANNINK & COVENEY LLP  
4180 La Jolla Village Drive, Suite 530  
4 La Jolla, California 92037-1474  
Tel: 858-623-4200  
5 Fax: 858-623-4299

6 MICHAEL RUBIN (80618)  
mrubin@altber.com  
7 ERIC P. BROWN (284245)  
ebrown@altber.com  
8 ALTSHULER BERZON LLP  
177 Post Street, Suite 300  
9 San Francisco, CA 94108  
Tel: 415-421-7151  
10 Fax: 415-362-8064

11 Attorneys for Plaintiffs

12 CHRISTINA G. SARCHIO, District of Columbia Bar No. 456254)  
(Admitted Pro Hac Vice)  
13 DECHERT LLP  
1900 K Street, NW  
14 Washington, DC 20006  
Telephone: (202) 261-3300  
15 Facsimile: (202) 261-3333

16 Attorneys for Defendants

17 [Additional Counsel for the Parties Listed on Next Page]

18 UNITED STATES DISTRICT COURT

19 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

20 PAULA L. BLAIR, ANDREA ROBINSON,  
21 and FALECHIA A. HARRIS, individually and  
on behalf of all others similarly situated,

22 Plaintiffs,

23 vs.

24 RENT-A-CENTER, INC., a Delaware  
25 corporation; RENT-A-CENTER WEST, INC.,  
a Delaware corporation; and DOES 1-50,  
26 inclusive,

27 Defendants.  
28

CASE NO. 3:17-cv-02335-WHA

**STIPULATION AND ~~PROPOSED~~  
ORDER MODIFYING SCHEDULE FOR  
MOTION FOR CLASS CERTIFICATION**

1 VICKIE E. TURNER (106431)  
ROBERT K. DIXON (262252)  
2 KIRSTEN F. GALLACHER (286137)  
WILSON TURNER KOSMO LLP  
3 550 West C Street, Suite 1050  
San Diego, California 92101  
4 Tel: 619-236-9600  
Fax: 619-236-9669

5 GREGORY G. ISKANDER, (200215)  
6 LITTLER MENDELSON, P.C.  
Treat Towers  
7 1255 Treat Boulevard, Suite 600  
Walnut Creek, California 94597  
8 Tel: 925-932-2468  
Fax: 925-946-9809

9 ROBERT F. FRIEDMAN, Texas Bar No. 24007207  
10 (Admitted Pro Hac Vice)  
LITTLER MENDELSON, P.C.  
11 2001 Ross Avenue  
Suite 1500, Lock Box 116  
12 Dallas, Texas 75201.2931  
Telephone: 214.880.8100  
13 Facsimile: 214.880.0181

14 DECHERT LLP  
H. Joseph Escher III (85551)  
15 h.joseph.escher@dechert.com  
Lily A. North  
16 lily.north@dechert.com (106431)  
One Bush Street, Suite 1600  
17 San Francisco, CA 94104  
Telephone: (415) 262-4500  
18 Facsimile: (415) 262-4555

19 Attorneys for Defendants  
20  
21  
22  
23  
24  
25  
26  
27  
28

1 Through their respective counsel, plaintiffs Paula L. Blair, Andrea Robinson and Falechia  
2 Harris (“Plaintiffs”) and defendants Rent-A-Center, Inc. and Rent-A-Center West, Inc.  
3 (“Defendants”) respectfully request an order modifying the briefing schedule and hearing date for  
4 Plaintiffs’ motion for class certification. As explained below, the parties request that the  
5 opposition deadline be extended to June 14, 2018; that the reply deadline be extended to July 5,  
6 2018; and that the hearing be set for July 19, 2018.

7 STIPULATION

8 WHEREAS, on March 16, 2018, the Court entered an Amended Case Management Order  
9 (Dkt. 92) setting May 10, 2018 as the deadline for Plaintiffs to file their motion for class  
10 certification, to be heard on a 49-day track.

11 WHEREAS, Plaintiffs timely filed their motion for class certification on May 10, 2018  
12 (Dkt. 109). The motion is calendared for hearing on June 28, 2018; Defendants’ opposition is  
13 currently due on May 31, 2018 and Plaintiffs’ reply is currently due on June 14, 2018.

14 WHEREAS, in support of the motion for class certification, Plaintiffs filed the declaration  
15 of a retained expert, David M. Breshears (Dkt. 109-20). Defendants requested to take the  
16 deposition of Mr. Breshears before filing their opposition. Defendants also informed Plaintiffs of  
17 their intent to submit an opposition declaration from a retained expert, and Plaintiffs will seek to  
18 take that expert’s deposition before filing their reply.

19 WHEREAS, due to the impacted schedules of Mr. Breshears and Plaintiffs’ counsel,  
20 Defendants’ request for the deposition could not be accommodated, thus, Plaintiffs proposed and  
21 Defendants agreed to jointly request that the opposition deadline be extended to June 14, 2018;  
22 that the reply deadline be extended to July 5, 2018, and that the hearing date on the motion for  
23 class certification be set for July 19, 2018 (the Court is not available the prior week, July 12).  
24 This modification will facilitate the scheduling of Mr. Breshears’ deposition as well as the  
25 deposition of Defendants’ expert, and will thus facilitate the parties’ presentation of the issues and  
26 evidence in their respective opposition and reply briefs.

27 ///

28 ///

1 This proposed modification relates only to the motion for class certification, and does not  
2 affect other deadlines in the Amended Case Management Order.

3 IT IS SO STIPULATED.

4 Dated: May 22, 2018

DECHERT LLP

5  
6 /s/ Christina G. Sarchio

CHRISTINA G. SARCHIO

7 Attorneys for Defendants

8 Dated: May 22, 2018

DOSTART HANNINK & COVENEY LLP

9  
10 /s/ Zach P. Dostart

ZACH P. DOSTART

11 Attorneys for Plaintiffs  
12  
13

14 ORDER

15 Having reviewed and considered the foregoing Stipulation, and finding good cause,

16 IT IS HEREBY ORDERED that the hearing on Plaintiffs' Motion for Class Certification is  
17 continued to July 19, 2018, at 8:00 a.m. Defendants shall file their opposition by June 14, 2018,  
18 and Plaintiffs shall file their reply by July 5, 2018.

19 IT IS SO ORDERED.

20 Dated: May 23, 2018

21   
22 WILLIAM ALSUP

UNITED STATES DISTRICT JUDGE  
23  
24  
25  
26  
27  
28